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KIMBERLEE WILLIAMS, et al.,

Plaintiffs,

vs.

BASF CATALYSTS LLC, et al.,

Defendants.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

DOCKET NO. 11-1754  
CIVIL ACTION

**CERTIFICATION OF COUNSEL**

CHRISTOPHER M. PLACITELLA, of full age, hereby certifies as follows:

1. I am an attorney at law in the State of New Jersey and a shareholder with the law firm of Cohen, Placitella, and Roth, P.C.
2. I am familiar with the facts and circumstances of the within action.
3. Attached as Exhibit 1 is a true and correct copy of CM/ECF # 534.

4. Attached as Exhibit 2 is a true and correct copy of Notice of Appeal of the Cost-Shifting Order (CM/ECF #534).

5. Attached as Exhibit 3 is a true and correct copy of Superseding Order from Special Master ECF Nos. 516 and 534 (CM/ECF # 565).

6. Attached as Exhibit 4 is a true and correct copy of Plaintiffs' Third Set of Interrogatories and Fifth Set of Document Requests Addressed to Defendant BASF Catalysts, LLC.

7. Attached as Exhibit 5 is a true and correct copy of BASF Responses and Objections to Plaintiffs' Third Set of Interrogatories and 5<sup>th</sup> Set of Request for Production of Documents.

8. Attached as Exhibit 6 is a true and correct copy of Plaintiffs Motion to Compel answers to interrogatories and request for production of documents.

9. Attached as Exhibit 7 is a true and correct copy of BASF's opposition to Plaintiffs' Motion to Compel.

10. Attached as Exhibit 8 is a true and correct copy of Declaration of Kevin Wood (CM/ECF # 529-14).

11. Attached as Exhibit 9 is a true and correct copy of CM/ECF # 533.

12. Attached as Exhibit 10 is a true and correct copy of Order from Special Master CM/ECF # 362.

13. Attached as Exhibit 11 is a true and correct copy of the transcript of the October 26, 2017 hearing.

14. Attached as Exhibit 12 is a true and correct copy of the transcript of the May 14, 2018 deposition of Arthur Dornbusch, Esq.

15. Attached as Exhibit 13 is a true and correct copy of the transcript of the April 24, 2018 deposition of Michael Hassett.

16. Attached as Exhibit 14 is a true and correct copy of the transcript of the May 6, 2018 deposition of Daniel Steinmetz.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements by me are willfully false, I am subject to punishment.

COHEN, PLACITELLA & ROTH, P.C.  
Attorneys for Plaintiffs

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Dated: June 25, 2018